

1 **ILLINOIS COMMERCE COMMISSION**

2 **DOCKET NUMBER 12-0598**

3 **CORRECTED DIRECT TESTIMONY**

4 **OF**

5 **Intervener, Louise Brock-Jones Limited Partnership**

6 **Q:** Please state your name?

7 **A:** **Barbara File**

8 **Q:** Please state your current residence?

9 **A:** **825 Hanna Road**

10 **Manchester, MO 63021**

11 **Q:** Please identify by street address and parcel number any real property in which you claim
12 an interest that will be affected by the proposed electric transmission line and related facilities
13 that are subject of Ameren Transmission Company of Illinois' ("ATXI) Petition currently before
14 the Illinois Commerce Commission?

15 **A:** **PIN: 12-0-00462-000 attached hereto as Exhibit 1 is a true and correct copy of a**
16 **map depicting the property.**

17 **PIN: 12-0-00610-000 attached hereto as Exhibit 1 is a true and correct copy of a**
18 **map depicting the property.**

19 **PIN: 12-0-00350-000 attached hereto as Exhibit 2 is a true and correct copy of a**
20 **map depicting the property.**

21 **PIN: 12-0-00364-000 attached hereto as Exhibit 2 is a true and correct copy of a**
22 **map depicting the property.**

23 **Collectively referred to herein as (the "Property")**

24 **Q:** Please identify the nature of your interest in the property?

25 **A:** **I am a partner in the Louise Brock-Jones Limited Partnership.**

26 **Q:** How is the property currently used?

27 **A:** **Agriculture: corn and soybeans.**

28 **Q:** Are there any building(s) and/or structure(s) on the property?

29 **A:** **Yes. There is an implement building that stores combines and other large farm**
30 **equipment. There is also a machine shed that is used for storage of equipment.**

31 **Q:** Is there any revenue that is earned from the property, if so what is the revenue?

32 **A:** Yes. I derive revenue from the farming on the property.

33 **Q:** What is the quality of the soil on the property?

34 **A:** The soil type for the ground on which the proposed primary route is ideal soil and I
35 believe that the transmission lines will take farm ground out of production because of the
36 transmission line towers as well as the easements, which would allow ATXI to maintain and
37 repair the transmission lines.

38 **Q:** Is the property encumbered by any existing utility easement(s)?

39 **A:** No encumbrances that I know of.

40 **Q:** Do you oppose the primary route proposed by ATXI?

41 **A:** Yes.

42 **Q:** Do you oppose the entire length of the primary route?

43 **A:** Yes.

44 **Q:** What is the basis of your opposition to the primary route?

45 **A:** 1. Soil Compaction: The transmission line towers will involve disrupting the soil. I
46 know that when you continually run construction equipment over farm ground,
47 there is a loss of yield at the location of the construction. When a person operates
48 heavy equipment over farm ground, it impacts the ability of plant roots to penetrate
49 to the soil to reach water and nutrients (e.g., fertilizer), which results in lesser or no
50 yield. I am of the opinion that the soil will experience a reduction in yields for up to
51 seven years.

52 2. Drainage: I have drainage tiles in the vicinity of the proposed primary route. The
53 construction of the lines will likely disrupt or destroy the drainage tiles.

54 3. Aerial Spraying: I use aerial spraying in my farming operations. The proposed
55 placement for the primary transmission line route will split the property in half.
56 Both sides of the property are used for agricultural purposes. The transmission
57 line will make it difficult or impossible to conduct effective aerial spray applications.
58 We do top air spraying which is 100 feet wide. Certain corn hybrids do need a
59 fungicide application done by airplane at the time of tassel, which is done every
60 year.

61 4. **Field Efficiency:** The possible placement of transmission line towers on the
62 property will have a negative impact on field efficiency.

63 5. **Weed Control:** If the towers are placed on the Property, we will have to perform
64 weed control on and around the towers. The presence of weeds reduces yield
65 because the weeds will consume water and nutrients otherwise utilized by the corn
66 or soybeans.

67 6. **Land Value:** The installation of the transmission line will have a permanent,
68 negative impact on value of the Property.

69 Q. What type of soil do you have?

70 A: We have high quality soil. Attached as Exhibit 3 is a true and correct copy of a Soil
71 Type Data Report from 2010.

72 Q: What is the expected financial loss from the use of the property as a result of the primary
73 route?

74 A: I will incur a financial loss as a result of a loss of yield because of soil compaction
75 and drainage issues. I will also incur a financial loss because of the impact on tenant
76 farming leases during the time period of construction.

77 Q: What is the proximity of the building(s) and/or structure(s) on the property to the primary
78 route proposed by ATXI?

79 A: There are no buildings nearby that are impacted by the transmission route.

80 Q: Are you in favor of ATXI utilizing the alternate route proposed by ATXI?

81 A: Yes.

82 Q: Please identify any other party or individual who may have an interest in the property,
83 and explain the nature of such interest?

84 A: Mark Donnell and Nils Donnell are the Tenant Farmers of the property.

85 Q: If there is an individual or party who has interest in the property, does that party or
86 individual oppose the primary route proposed by ATXI?

87 A: Louise Brock-Jones Limited Partnership's tenants, Mark Donnell and Nils Donnell,
88 object to the proposed primary route of ATXI.

89 Q: Does the individual or party oppose the entire length of the primary route?

90 A: Yes.

91 Q: What is the basis for the individual's or party's opposition to the primary route?

92 A: Mark Donnell and Nils Donnell object to the primary route for the reasons set forth
93 above.

94 Q: Does the individual or party oppose the entire length of the primary route?

95 A: Yes

96 Q: Does this conclude your testimony?

97 A: Yes.

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100 BARBARA FILE

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104 STATE OF ILLINOIS)

105) SS

106 COUNTY OF COLES)

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108 Signed and Sworn to before me, a Notary in the County and State aforesaid by

109 Barbara File on this 27 day of March, 2013

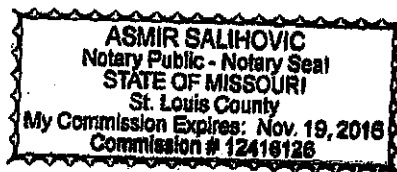
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